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11 *Attorneys for Defendants*

12 IN THE UNITED STATES DISTRICT COURT

13 FOR THE DISTRICT OF NEVADA

14 TRUSTEES OF THE BRICKLAYERS & ALLIED  
15 CRAFTWORKERS LOCAL 13 DEFINED  
16 CONTRIBUTION PENSION TRUST FOR  
17 SOUTHERN NEVADA; TRUSTEES OF THE  
18 BRICKLAYERS & ALLIED CRAFTWORKERS  
19 LOCAL 13 HEALTH BENEFITS FUND;  
20 TRUSTEES OF THE BRICKLAYERS & ALLIED  
21 CRAFTWORKERS LOCAL 13 VACATION FUND;  
22 BRICKLAYERS & ALLIED CRAFTWORKERS  
23 LOCAL 13 NEVADA; TRUSTEES OF THE  
24 BRICKLAYERS & TROWEL TRADES  
INTERNATIONAL PENSION FUND; TRUSTEES  
OF THE BRICKLAYERS & TROWEL TRADES  
INTERNATIONAL HEALTH FUND; TRUSTEES  
OF THE INTERNATIONAL MASONRY  
INSTITUTE,

Case No. 2:20-cv-00224-GMN-BNW

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT  
[FIRST REQUEST]**

Plaintiffs,

v.

PEGASUS MARBLE, INC., a Nevada corporation;  
CYGNUS, LLC, a Nevada limited liability company;  
and GAGIK ZARGARYAN, individually, TOKIO  
MARINE HCC dba AMERICAN CONTRACTORS  
INDEMNITY COMPANY, a California insurance  
corporation

Defendants.

///

1 **STIPULATION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFF'S**  
2 **MOTION FOR SUMMARY JUDGMENT**  
3 **[FIRST REQUEST]**

4 The parties, by and through their respective counsel of record, hereby stipulate and request that  
5 this Court extend the deadline for Defendants to respond to Plaintiffs' Motion for Summary Judgment.  
6 The parties request an extension for twenty-one (21) days from its currently set date of February 11,  
7 2022 to up to and including March 4, 2022.

8 Good cause exists for this extension of time due to the fact that Plaintiff's counsel responded to  
9 a fatal incident on Thursday, February 3, 2022, investigated by the Las Vegas Metropolitan Police  
10 Department and Clark County School District Police Department. Also due to a separate incident that  
11 occurred last week regarding the injury of Plaintiffs' counsel's daughter at school, counsel had a  
12 meeting with Clark County School District Police Department today, February 7, 2022. Additionally,  
13 Plaintiff's counsel also has multiple briefs in various courts which are also currently due on extension.

14 As such, the Parties respectfully make this request to extend time in good faith and not for the  
15 purposes of undue delay of these proceedings.

16 IT IS SO STIPULATED.

17 DATED this 8th day of February 2022

18 **LAW OFFICE OF DANIEL MARKS**

19 /s/Adam Levine, Esq.  
20 ADAM LEVINE, ESQ.  
21 Nevada State Bar No. 004673  
alevine@danielmarks.net  
22 610 South Ninth Street  
Las Vegas, Nevada 89101  
*Attorneys for Defendants*

16 DATED this 8th day of February 2022

17 **NOVARA TESIJA CATENACCI**  
**MCDONALD & BAAS, PLLC**

18 /s/Nathan R. Ring, Esq.  
19 NATHAN R. RING, ESQ.  
20 Nevada State Bar No. 12078  
nring@ntclaw.com  
21 3960 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
*Attorneys for Plaintiffs*

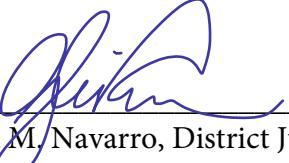
1  
2 *Trustees Of The Bricklayers & Allied Craftworkers Local 13 Defined Contribution*  
3 *Pension Trust For Southern Nevada, et al., v. Pegasus Marble, Inc., et al.*

4 U.S. District Court Case No. 2:20-cv-00224-GMN-BNW  
5 STIPULATION TO EXTEND TIME FOR DEFENDANTS  
6 TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT  
7 [FIRST REQUEST]

8 **ORDER**

9 **IT IS SO ORDERED.**

10 Dated this 9 day of February, 2022.

11   
12 Gloria M. Navarro, District Judge  
13 UNITED STATES DISTRICT COURT

**Joi Harper**

---

**From:** Nathan Ring <nrr@novaralaw.com>  
**Sent:** Tuesday, February 08, 2022 4:21 PM  
**To:** Joi Harper  
**Cc:** Adam Levine  
**Subject:** Re: Trustees v. Cygnus LLC annatto

Hello Joi:

I apologize for my delayed response. My firm name is actually Novara Tesija Catenacci McDonald & Baas, PLLC. With that single change, I have no other edits and you may add my electronic signature.

Thanks,

Nate

Nathan R. Ring, Esq.  
Partner  
3993 Howard Hughes Pkwy, Suite 480  
Las Vegas, NV 89169  
Cell: 702-301-0081

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**From:** Joi Harper <JHarper@danielmarks.net>  
**Sent:** Tuesday, February 8, 2022 4:09:50 PM

**To:** Nathan Ring  
**Cc:** Adam Levine  
**Subject:** RE: Trustees v. Cygnus LLC annatto

Good afternoon Nate,

I was just following up. I hadn't hear back from you re the Stipulation I sent yesterday.

-----Original Message-----

From: Joi Harper  
Sent: Monday, February 07, 2022 4:23 PM  
To: Nathan Ring <nrr@novaralaw.com>  
Cc: Adam Levine <ALevine@danielmarks.net>  
Subject: RE: Trustees v. Cygnus LLC annatto

Good afternoon Nathan,

Attached is the Stipulation and Order to Extend Time for Defendants to Respond to Plaintiffs' Motion for Summary Judgment. Please let me know if this is acceptable to you and if so, please either sign and return to me, or give me permission to affix your e-signatures to the document for submission to the court.

Thank you,

Joi E. Harper, Paralegal  
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Las Vegas, Nevada 89101  
O: (702) 386-0536; F: (702) 386-6812  
JHarper@danielmarks.net

-----Original Message-----

From: Adam Levine <ALevine@danielmarks.net>  
Sent: Monday, February 07, 2022 9:45 AM  
To: Nathan Ring <nrr@novaralaw.com>  
Cc: Joi Harper <JHarper@danielmarks.net>  
Subject: RE: Trustees v. Cygnus LLC annatto

I can do 21 days.

Joi: Please prepare the stipulation

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-----Original Message-----

From: Nathan Ring <nrr@novaralaw.com>  
Sent: Monday, February 7, 2022 9:44 AM

To: Adam Levine <ALevine@danielmarks.net>  
Cc: Joi Harper <JHarper@danielmarks.net>  
Subject: Re: Trustees v. Cygnus LLC annatto

Adam,

I am happy to grant you an extension but I am not sure the court will approve 30 days. That will run us into our court scheduled settlement conference. With a 30 day extension, my reply would be filed just before the settlement conference and I would be preparing the Reply at the same time as the settlement brief. Would 21 days work? Short month of February doesn't help us here.

Nate

Nathan R. Ring, Esq.  
Partner  
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From: Adam Levine <ALevine@danielmarks.net>  
Sent: Monday, February 7, 2022 9:17:52 AM  
To: Nathan Ring  
Cc: Joi Harper  
Subject: Trustees v. Cygnus LLC annatto

Nathan:

My Opposition to your Motion for Summary Judgment is due this Friday. There is no way I am going to make it. Can I get a 30 day extension?

Adam Levine, Esq.  
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